

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ACCURIDE ERIE L.P., a limited partnership,

Plaintiff/Counterclaim Defendant

v.

INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE, AND
AGRICULTURAL IMPLEMENT WORKERS
OF AMERICA, LOCAL 1186, a voluntary
unincorporated association,

Defendant/Counterclaim Plaintiff.

Case No. 05-CV-169 Erie

Judge Sean J. McLaughlin

[Electronically Filed]

MOTION TO ADMIT ATTORNEY CATHERINE J. TRAFTON PRO HAC VICE

Defendant and Counterclaim Plaintiff International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, UAW and its Local 1186 (“UAW”), by its undersigned counsel (a member of the Bar of this Court), respectfully moves the Court to admit **Catherine J. Trafton, Esq.**, UAW Associate General Counsel, whose office is located at 8000 East Jefferson Avenue, Detroit, MI 48214, *pro hac vice*, so that she may participate in the above-captioned action on behalf of the UAW, as co-counsel to William T. Payne (the undersigned). In support of this Motion, the undersigned counsel avers as follows:

1. Ms. Trafton has been admitted to practice to, and has been a member in good standing of, the Bar of the State of Michigan since 2001, and a member in good standing of the Bar of the State of Massachusetts since 2000. She is admitted to practice before the United

States District Court for the Eastern District of Michigan and the United States Courts of Appeals for the Second, Sixth, Seventh, Tenth and D.C. Circuits.

2. Ms. Trafton is familiar with this matter, and has been requested by the UAW to be actively involved in the action.

3. Attached hereto is an Affidavit executed by Ms. Trafton, affirming her membership in good standing of the Bar of the State of Michigan and the Bar of the State of Massachusetts.

WHEREFORE, Defendant and Counterclaim-Plaintiff UAW respectfully requests that this Court admit Catherine J. Trafton, *pro hac vice*, to the Bar of the United States District Court for the Western District of Pennsylvania for the purpose of participating on behalf of the UAW in the above-captioned matter as co-counsel with William T. Payne.

Respectfully submitted,

s/ William T. Payne

William T. Payne

PA Bar # 38083

1007 Mt. Royal Boulevard

Pittsburgh, PA 15223

Phone: (412) 492-8797

Fax: (412) 492-8978

E-mail: wpayne@stargate.net

Attorney for Defendant and Counterclaim Plaintiff UAW

Dated: August 3, 2005

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2005, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the persons listed below:

Arthur Martinucci, Esq.
Quinn, Buseck, Leemhuis, Toohey & Kroto, Inc.
2222 W. Grandview Blvd.
Erie, PA 16506
amartinucci@quinnfirm.com

I also certify that on August 3, 2005, I mailed by United States Postal Service the foregoing document to the persons listed below:

Frederick C. Miner, Esq.
Andrea G. Lisenbee, Esq.
Ryley Carlock & Applewhite
One North Central Avenue, Suite 1200
Phoenix, Arizona 85004-4417

s/ William T. Payne
William T. Payne